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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

GOODMAN NETWORKS, INC.,

Debtor.

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Chapter 7

Case No. 22-31641 (MVL)

**JOINT UNOPPOSED MOTION OF SCOTT M.  
SEIDEL, CHAPTER 7 TRUSTEE; UMB BANK, NATIONAL  
ASSOCIATION, AS INDENTURE TRUSTEE; AND THE MAJORITY  
NOTEHOLDER GROUP FOR EXPEDITED HEARING ON UNOPPOSED  
JOINT EXPEDITED MOTION FOR ENTRY OF AN ORDER DIRECTING  
AN EXAMINATION UNDER BANKRUPTCY RULE 2004 OF EAST WEST BANK**

Scott M. Seidel (the “Trustee”), the duly appointed chapter 7 trustee of the bankruptcy  
estate of Goodman Networks, Inc. (the “Debtor”); UMB Bank, National Association, as indenture

trustee (the “**Indenture Trustee**”); and the Majority Noteholder Group<sup>1</sup> (together with the Indenture Trustee, the “**Bondholders**” and collectively with the Trustee, the “**Movants**”), for their motion for an expedited hearing (the “**Motion to Expedite**”) on their *Joint Unopposed Expedited Motion for Entry of an Order Directing an examination Under Bankruptcy Rule 2004 of East West Bank* (the “**2004 Motion**”)<sup>2</sup> filed contemporaneously herewith, respectfully represent:

1. As set forth in the 2004 Motion, the Movants are seeking an examination under Bankruptcy Rule 2004 of East West Bank (“**East West**”) regarding accounts, obligations and other financial information of the Debtor, the Applicable Subsidiaries, all Grantors, and/or other Goodman-related parties. Counsel for East West has represented that East West has no objection to the entry of the order granting the 2004 Motion as to the issuance of the Subpoena on an expedited basis, subject to a reservation of East West’s substantive rights with respect to its response to the subpoena. In turn, the Trustee confirms that he has no objection to the disclosure or production of the information and/or documents pertaining to the Applicable Subsidiaries requested in or implicated by the Subpoena. Counsel for East West has confirmed that East West has no objection to the relief sought in this Motion to Expedite.

2. By this Motion to Expedite, the Movants respectfully request that the Court set a hearing on the 2004 Motion on November 21, 2023 at 2:00 pm (subject to the Court’s availability).

3. The Movants understand that East West may be holding property of the Debtor’s estate or property belonging to a subsidiary of the Debtor or a Grantor as a guarantor of the

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<sup>1</sup> The Majority Noteholder Group consists of investment advisers or managers of funds that hold (with such investment advisers and managers acting on behalf of such holders), or are beneficial holders of, a majority of the 8% Senior Secured Notes due 2022 issued by Goodman Networks, Inc., and include JLP Credit Opportunity Master Fund Ltd., JLP Credit Opportunity IDF Series Interests of the SALI Multi-Series Fund, L.P., JLP Institutional Credit Master Fund LP, Alimco Re Ltd., Marli B. Miller Trust A4, Miller Family Education and Medical Trust, Susan F Miller Spousal IRA, Susan F. Miller Spousal Trust A4, DuPont Pension Trust, and Hilltop Securities, Inc.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings given to them in the 2004 Motion.

obligations of the Debtor. Understanding what property East West may be holding in which the Debtor's estate has an interest, or the disposition of such property, is vital to the proper administration of this case. Further, Counsel for East West has represented that East West has no objection to the relief requested herein (subject to a reservation of East West's rights as set forth in Paragraph 1 above).

4. The Movants estimate that a hearing on the 2004 Motion no more than 15 minutes to complete.

Dated: November 16, 2023

Respectfully submitted,

/s/ Philip M. Guffy  
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*Counsel for Scott M. Seidel, Trustee*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the Movants conferred with counsel for East West regarding the relief requested herein, and that East West has no objection to the relief requested herein

/s/ Philip M. Guffy  
Philip M. Guffy

**CERTIFICATE OF SERVICE**

I certify that, on November 16, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas on all parties registered to receive electronic notice and by overnight delivery on the following recipients:

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/s/ Philip M. Guffy  
Philip M. Guffy